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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ANDREA RIDGELL, on behalf of herself
and others similarly situated
Plaintiff,

v.

FRONTIER AIRLINES, INC. a
Colorado corporation; AIRBUS
S.A.S., a foreign corporation doing
business in the State of California;
AIRBUS GROUP HQ INC., a
corporation doing business in the State
of California

Defendants.

Case No.: 2:18-CV-04916 PA (AFMx)

**DECLARATION OF PLAINTIFF
ANDREA RIDGELL IN SUPPORT
OF MOTION FOR CLASS
CERTIFICATION**

**DATE: 11/19/18
TIME: 1:30 p.m.
DEPT: 9A**

DECLARATION OF ANDREA RIDGELL

I, Andrea Ridgell, declare as follows:

1. I am an adult, over the age of 18 years old. I am a resident of the State of California. I am a named Plaintiff and a prospective class member in *ANDREA RIDGELL, on behalf of herself and others similarly situated v. FRONTIER AIRLINES, INC. a Colorado corporation; AIRBUS S.A.S., a foreign corporation doing business in the State of California; AIRBUS GROUP HQ INC., a corporation doing business in the State of California* (Case No. 2:18-CV-04916 PA (AFMx), currently pending in the United States District Court for the Central District of California.

2. I have personal knowledge of the matters stated herein, and if called to testify about these facts, I could and would do so in a competent and truthful manner. I make this declaration in support of Plaintiff's Motion for Class Certification against Defendants AIRBUS S.A.S., a foreign corporation doing business in the State of California; AIRBUS GROUP HQ INC., a corporation doing business in the State of California (collectively, "AIRBUS").

Background

3. On June 2, 2017, I boarded Frontier Airlines flight number F91630 with a scheduled departure time of 10:19 PM and an arrival time of 6:04 AM on June 3, 2017. The flight was direct from Los Angeles to Phoenix with no scheduled stops.

4. I believe the aircraft to have been an airbus A320.

5. Approximately two hours into the flight the plane experienced a problem with the air quality in the cabin.

6. I, and many of my fellow passengers, experienced physical distress including one or more of the following non-exhaustive symptoms: passing out, choking, coughing and eye irritation.

1 7. Upon information and belief, while onboard the subject aircraft, I and the
2 members of the classes, were exposed to toxic fumes that entered the
3 passenger cabin through the aircraft's ventilation system as a result of what
4 is commonly referred to as a "fume" event.

5 8. As a result of the aforementioned problems, the aircraft was forced to make
6 an emergency landing in Phoenix, Arizona, and the subject aircraft was
7 grounded. The all of the passengers were immediately de-boarded from the
8 plane.

9 9. Some of the passengers were analyzed by paramedics, others were taken to
10 the hospital.

11 10. Although we each requested to leave, the passengers were confined in the
12 terminal. We were not permitted to board other flights or to leave the
13 terminal area.

14 11. After three (3) hours the passengers were released from the forced
15 confinement.

16 12. I contacted Frontier about the incident on or about June 7, 2017 via email
17 submitted through Frontier's website. Defendant Frontier in a response
18 email received June 7, 2017, stated that there was "nothing wrong with [the
19 plane]" and did not provide me with any additional details or redress other
20 than a \$200 travel voucher (provided to all passengers) which expired on
21 September 7, 2017.

22 13. To date, Frontier has not informed me of the name and type of chemicals to
23 which I was exposed.
24

25 **Class Representative Status**

26 14. I seek to be a Class Representative for this lawsuit. I understand that a
27 Class Representative:

28 (a) represents the interests of all members of the class in litigation

1 to recover money damages or obtain injunctive relief for the
2 class;

3 (b) has claims that are typical of those of the class, thus involving
4 common issues of law or fact;

5 (c) always consider the interests of the class just as he would
6 consider his own interests and, in some cases, must put the
7 interests of the class before his own interests. This means that
8 the Class Representative is a fiduciary to the Class;

9 (d) always actively participate in the lawsuit, as necessary, by,
10 among other things, answering interrogatories, producing
11 documents to the requesting party and giving deposition and
12 trial testimony if required;

13 (e) may be required to travel to give such testimony;

14 (f) recognizes and accepts that any resolution of the lawsuit, by
15 dismissal or settlement, is subject to court approval, and must
16 be designed in the best interest of the class as a whole;

17 (g) is not required to be particularly sophisticated or
18 knowledgeable about the subject of the lawsuit;

19 (h) should follow the progress of the lawsuit and should provide
20 all relevant facts to the lawyers for the class;

21 (i) volunteers to represent or champion many other people with
22 similar claims and injuries because of the importance of the
23 case and the necessity that all class members benefit from the
24 lawsuit equally; the savings of time, money and effort should
25 benefit all parties and the court.

26 15. To date, I have performed a number of tasks in my role as a Class
27 Representative. This includes the following:

28 a. Being in regular contact with my counsel regarding the
status of my lawsuit, and providing my counsel with any

1 information or documents upon request.

2 16.I understand that the members of the proposed classes are similarly-situated
3 with respect to a common course of conduct or practice.

4 17.I understand that class actions are an important tool to assure compliance
5 with the law even where an individual's losses may be relatively small.

6 18.I have no interests which are inconsistent with the interests of Class
7 Members and will adequately represent Class Members. I brought this
8 lawsuit on behalf of myself and all other non-exempt or hourly employees
9 similarly situated to rectify legal wrongs being committed by Defendants.
10 The legal and factual issues for which I seek to have this case certified as a
11 class action are typical of my own legal and factual issues.

12 (a) As a Class Representative I will always consider the interests
13 of Class Members just as I would consider my own interests
14 and, in some cases, must put the interests of Class Members
15 before my own interests. I have and will continue to actively
16 participate in the lawsuit, as necessary, including answering
17 interrogatories, producing documents as requested, giving
18 deposition and trial testimony, and helping in any other way I
19 can. I recognize and accept that any resolution of this lawsuit,
20 by dismissal or settlement, is subject to court approval, and
21 must be designed in the best interest of the class as a whole.

22 I declare under penalty of perjury under the laws of the State of California
23 and the United States of America that the foregoing is true and correct. Executed
24 this 22nd day of October 2018, at Santa Barbara, California.

25
26 _____
27 Andrea Ridgell
28